

## Exhibit 18

IN THE UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION

~~~~~

IN RE: NATIONAL PRESCRIPTION MDL No. 2804  
OPIATE LITIGATION

Case No. 17-md-2804

Judge Dan Aaron

This document relates to: Polster

County of Cuyahoga v. Purdue  
Pharma L.P., et al.

City of Cleveland, Ohio v. Purdue  
Pharma L.P., et al.

The County of Summit, Ohio, et al.  
v. Purdue Pharma L.P., et al.

Case No. 1:18-OP-45132

~~~~~

Deposition of  
SCOTT MORAN

December 20, 2018

9:00 a.m.

Taken at:

Zashin & Rich  
950 Main Avenue, Fourth Floor  
Cleveland, Ohio

Renee L. Pellegrino, RPR, CLR  
THE FOLLOWING PAGES WERE DEEMED  
HIGHLY CONFIDENTIAL: 128-170

1 APPEARANCES:

2 On behalf of the City of Cleveland:

Zarzaur Mujumdar & Debrosse

3 DIANDRA DEBROSSE ZIMMERMAN, ESQ.

2332 2nd Avenue North

4 Birmingham, Alabama 35203

(205) 983-7985

5 fuli@zarzaur.com

- and -

6 Zashin & Rich

AMI J. PATEL, ESQ.

7 950 Main Avenue, Fourth Floor

Cleveland, Ohio 44113

8 (216) 696-4441

ajp@zrlaw.com

9 City of Cleveland:

10 ELENA BOOP, ESQ.

601 Lakeside Avenue, Room 106

11 Cleveland, Ohio 44114

(216) 664-3727

12 eboop@city.cleveland.oh.us

13 On behalf of Walgreens:

Bartlit Beck LLP

14 MATTHEW BREWER, ESQ.

Courthouse Place

15 54 West Hubbard Street, Suite 300

Chicago, Illinois 60654

16 (312) 494-4432

matthew.brewer@bartlit-beck.com

17 On behalf of Walmart, Inc.:

18 Jones Day

KRISTIN S.M. MORRISON, ESQ.

19 North Point, 901 Lakeside Avenue

Cleveland, Ohio 44114-1190

20 (216) 586-3939

kmorrison@jonesday.com

21 ~ ~ ~ ~ ~  
22  
23  
24  
25

1 APPEARANCES, CONT'D:

2 On behalf of Endo Pharmaceuticals, Inc., Endo  
3 Health Solutions, Inc., Par Pharmaceuticals,  
Inc. and Par Pharmaceutical Companies, Inc.:

Baker & Hostetler

4 TERA COLEMAN, ESQ.

Key Tower, 127 Public Square

5 Cleveland, Ohio 44114-1214

(216) 621-0200

6 tcoleman@bakerlaw.com

7 On behalf of McKesson Corporation:

Covington & Burling LLP

8 NEIL K. ROMAN, ESQ.

The New York Times Building

9 620 Eighth Avenue

New York, New York 10018-1405

10 (212) 841-1405

nroman@cov.com

11 - and -

Covington & Burling LLP

12 JOHN ZIPP, ESQ.

One CityCenter

13 850 Tenth Street, NW

Washington, D.C. 20001-4956

14 (202) 662-6000

jzippp@cov.com

15 On behalf of Mallinckrodt, LLC and SpecGx, LLC:

16 Ropes & Gray

JOSHUA GOLDSTEIN, ESQ.

17 Prudential Tower

800 Boylston Street

18 Boston, Massachusetts 02199-3600

(617) 951-7000

19 joshua.goldstein@ropesgray.com

- and -

20 Ropes & Gray

JESSICA F. SORICELLI, ESQ.

21 1211 Avenue of the Americas

New York, New York 10036-8704

22 (212) 596-9000

jessica.soricelli@ropesgray.com

23 ~ ~ ~ ~ ~  
24  
25

1 APPEARANCES, CONT'D:

2 On behalf of AmerisourceBergen Drug Corporation:

(Via Telephone)

3 Jackson Kelly

ANDREW N. SCHOCK, ESQ.

4 50 South Main Street

Suite 201

5 Akron, Ohio 44308

(330) 252-9060

6 aschock@jacksonkelly.com

7

ALSO PRESENT: Shaun Crum, Videographer

8

9

~ ~ ~ ~ ~

10

11

12

13

14

15

16

17

18

19

20

21

22

23

24

25

TRANSCRIPT INDEX

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25

APPEARANCES .....	2
INDEX OF EXHIBITS .....	6
INDEX OF OBJECTIONS .....	8
EXAMINATION OF SCOTT MORAN:	
BY MR. ROMAN .....	11
BY MR. BREWER .....	226
BY MR. GOLDSTEIN .....	245
AFTERNOON SESSION .....	
REPORTER'S CERTIFICATE .....	280
EXHIBIT CUSTODY - RETAINED BY COURT REPORTER	

1                   What was the question, was the  
2       warrant signed?

3           Q.       Yes.

4           A.       To the best of my recollection, I  
5       believe the warrant was signed.

6           Q.       And this was in December of 2005,  
7       correct?

8           A.       Yes.

9           Q.       In your affidavit you indicate  
10      that -- this is the first page -- that you  
11      believe that the person possessed OxyContin  
12      pills.

13                   Do you see that?

14          A.       I do.

15          Q.       And that's on the basis of a  
16      purchase of OxyContin from that person by an  
17      informant, correct?

18          A.       That is correct.

19          Q.       Do you recall any of the specifics  
20      of this case?

21          A.       No.

22          Q.       Were you aware of the abuse of  
23      OxyContin pills as of December of 2005?

24                   MS. DEBROSSE ZIMMERMAN: Object to  
25      form.

1           A.       I was aware of a person selling  
2       OxyContin pills in 2005.

3           Q.       And that was a problem for you?

4                   MS. DEBROSSE ZIMMERMAN:   Object to  
5       form.

6           Q.       Strike that.

7                   Did you believe that that was a  
8       crime?

9           A.       Yes.

10          Q.       And you believed it was a crime  
11       worth pursuing, correct?

12          A.       I'm a narcotics detective, sir.   If  
13       I have an opportunity to investigate in a drug  
14       crime, that's what I do.

15          Q.       And so you viewed the sale of  
16       prescription OxyContin as a drug crime, correct?

17          A.       Drug trafficking, yes, sir.

18          Q.       Okay.   When did you first become  
19       aware of trafficking of OxyContin pills?

20                   MS. DEBROSSE ZIMMERMAN:   Object to  
21       form.

22          A.       In this specific case or --

23          Q.       No.   In general.

24          A.       I don't know.

25          Q.       Certainly as of December of 2005,



1 correct?

2 A. Yes.

3 Q. How much before that?

4 A. I don't know.

5 Q. Do you recall whether you took steps  
6 to investigate the source of the OxyContin that  
7 was being sold in this warrant?

8 A. Sir, to be perfectly honest with  
9 you, this was 13 years ago. Without more  
10 specifics, I could not even tell you if this  
11 search warrant was executed.

12 - - - - -

13 (Thereupon, Moran Deposition Exhibit  
14 12, Search Warrant Beginning Bates  
15 Number CLEVE\_002250680, was marked  
16 for purposes of identification.)

17 - - - - -

18 Q. Mr. Moran, I'm handing you what has  
19 been marked as Moran Exhibit 12. It's a  
20 multi-page document bearing production numbers  
21 CLEVE 2250680 through 87.

22 Have you seen this document before?

23 A. I have. I typed it.

24 Q. This is another unsigned search  
25 warrant and affidavit, correct?